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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

JOSE RIVERA, an individual,

Plaintiff,

vs.

CSL PLASMA INC., a Foreign Corporation;
DAVID MUMFORD, an Individual, TIM
AVILA, an Individual, SHAMAURIA
COMARTIE, an Individual, JANET
MONARREZ, an Individual; DOES II through
XX, inclusive, and ROE BUSINESS
ENTITIES I through XX, inclusive,
Defendants.

Case No.: 2:23-cv-01810-JAD-DJA

**STIPULATION AND ORDER TO
CONTINUE JOINT STATUS REPORT**
(First Request)

ECF No. 20

Defendant CSL Plasma, Inc. (“Defendant”) and Plaintiff Jose Rivera (“Plaintiff”), by and through undersigned counsel, hereby submit this Stipulation and Order to continue the time within which the parties must submit a Joint Status Report pursuant to the Court’s November 7, 2023, minute order, to a date and time convenient to this Court, but no sooner than fifteen (15) days after the Court rules on the pending Motion for Remand. (ECF No. 8.) In support of the stipulation and request for a continuance, the parties state as follows:

1. Defendant CSL Plasma, Inc. filed a Petition of Removal on November 6, 2023. ECF No. 1. The Court entered a minute order on November 7, 2023, instructing the parties to “file a joint status of this action, including a statement of action required to be taken by this court” within 30 days. ECF No. 4. Accordingly, the parties must file the Joint Status Report no later than December 7, 2023.

2. On November 15, 2023, Plaintiff Jose Rivera filed a Motion to Remand. ECF No. 8. The motion has been fully briefed. ECF Nos. 16, 19. Oral arguments on the Motion to Remand is set for December 20, 2023. ECF No. 18.

3. This request for a continuance of the time within which to file a Joint Status Report is made, not for purposes of delay, but rather for purposes of efficiency and to conserve resources, including judicial resources. To the extent the Court grants Plaintiff's Motion for Remand, the Joint Status Report will be moot. In the event the motion is denied, the short continuance will not significantly delay proceedings.

4. This is the first request for an extension of time within which to file the Joint Status Report.

For the foregoing reasons, the parties respectfully request the Court grant a brief continuance of the time within which the parties must file the Joint Status Report as set forth in its November 7, 2023, to a date and time convenient to the Court, but no sooner than 15-days after the Court rules on Plaintiff's Motion to Dismiss.

DATED this 6th day of December, 2023.

LAGO INJURY LAW LLC

/s/ Al Lasso

Al Lasso, Esq.
Nevada Bar No. 8152
10161 Park Run Drive
Ste. 120
Las Vegas, NV 89145
Attorney for Plaintiff Jose Rivera

DATED this 6th day of December, 2023.

OGLETREE, DEAKINS, NASH, SMOAK & STEWART,
P.C.

/s/ Kathryn C. Newman

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ORDER

IT IS SO ORDERED.

DATED: 12/13/23, nunc pro
tunc to 12/7/23


UNITED STATES DISTRICT COURT JUDGE
JENNIFER A. DORSEY